

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|--------------------------------------|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| CORE SCIENTIFIC, INC., <i>et al.</i> |) | Case No. 22-90341 (DRJ) |
| |) | |
| |) | |
| Debtors. ¹ |) | (Jointly Administered) |
| |) | |

**THE AD HOC GROUP’S WITNESS AND
EXHIBIT LIST FOR MARCH 1, 2023 HEARING**

The Ad Hoc Group of Secured Convertible Noteholders (the “Ad Hoc Group”) files this Witness and Exhibit List for the hearing to be held on **March 1, 2023, at 3:30 p.m. (prevailing Central Time).**

WITNESSES

The Ad Hoc Group may call the following witnesses at the hearing:

1. Any witness called by any other party;
2. Impeachment witnesses as necessary; and
3. Any witness necessary to rebut testimony of a witness called or designated by any party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

EXHIBITS

| EXHIBIT | DESCRIPTION | MARK | OFFER | OBJECT | ADMIT | W/D | DISPOSITION AFTER HEARING |
|----------------|--|-------------|--------------|---------------|--------------|------------|--|
| 1 | Form 8-K Core Scientific, Inc., filed December 15, 2022 | | | | | | |
| 2 | Form 8-K Core Scientific, Inc., filed October 27, 2022 | | | | | | |
| 3 | <i>Declaration of Michael Bros in Support of the Debtors' Chapter 11 Petitions and First Day Relief</i> [Docket No. 5] | | | | | | |
| 4 | <i>Order (I) Authorizing the Debtors on an Interim Basis to (A) Obtain Senior Secured Non-Priming Superpriority Replacement Postpetition Financing and (B) use Cash Collateral, (II) Authorizing the Debtors to Refinance Existing Postpetition Financing on a Final Basis, (III) Granting Liens and Providing Claims With Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties On a Final Basis, (V) Modifying the Automatic Stay, (VI) Scheduling A Final Hearing, And (VII) Granting Related Relief</i> [Docket No. 447] | | | | | | |
| 5 | Historical Data of Core Scientific, Inc. (CORZQ), Yahoo Finance, https://finance.yahoo.com/quote/CORZQ/history?p=CORZQ (last visited Feb. 24, 2023); <i>see also</i> Historical Data of Bitcoin USD (BTC-USD), Yahoo Finance, https://finance.yahoo.com/quote/BTC-USD/history?p=BTC-USD (last visited Feb. 24, 2023) | | | | | | |
| 6 | Bitcoin Hash Rate, NASDAQ, https://data.nasdaq.com/data/BCHAIN/HRATE-bitcoin-hash-rate (last visited | | | | | | |

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|----|--|--|--|--|--|--|--|
| | Feb. 24, 2023) | | | | | | |
| 7 | <i>Schedules of Assets and Liabilities and Statements of Financial Affairs</i> [Docket Nos. 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 490]. | | | | | | |
| 8 | Schedule 14A Proxy Statement Core Scientific, Inc. filed April 7, 2022 | | | | | | |
| 9 | Form 3 and Form 4 Core Scientific, Inc. filed after March 28, 2022 | | | | | | |
| 10 | Secured Convertible Note Purchase Agreement, dated as of April 19, 2021 (as may be amended, restated, amended and restated, supplemented or otherwise modified from time to time, and including all related credit documents, and the notes issued thereunder) | | | | | | |
| 11 | Convertible Note Purchase Agreement, dated on or about August 20, 2021 (as may be amended, restated, amended and restated, supplemented or otherwise modified from time to time, and including all related credit documents, and the notes issues thereunder) | | | | | | |
| | Any exhibit designated or used by the Ad Hoc Group or any other party. | | | | | | |
| | Any exhibit necessary to rebut the evidence or testimony of any witness called or designated by the Ad Hoc Group or any other party. | | | | | | |
| | Any document or pleading filed in the above-captioned cases. | | | | | | |
| | Any exhibit necessary for impeachment and/or rebuttal purposes. | | | | | | |

RESERVATION OF RIGHTS

The Ad Hoc Group reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this Witness and Exhibit List prior to the hearing.

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Dated: February 27, 2023
Houston, Texas

Respectfully submitted

/s/ James T. Grogan III

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-and-

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*Counsel to the Ad Hoc Group of Secured Convertible
Noteholders*

Certificate of Service

I certify that on February 27, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ James T. Grogan III

James T. Grogan III